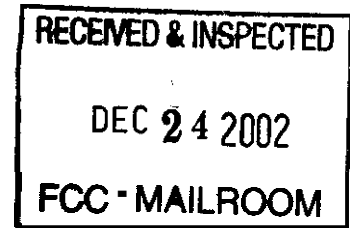


DOCKET FILE COPY ORIGINAL



December 20, 2002

Ms. Marlene H. Dortch  
Office of the Secretary  
445 Twelfth Street, SW, TW-A325  
Washington, D.C. 20554

Re: Petition for Rule Making (MB Docket No. 02-341)  
Supporting Comments for Encino, Texas

Dear Ms. Dortch:

Enclosed is **an** original **and** four (4) copies each of Petitioner's Comments for Encino, Texas.

Respectfully submitted,

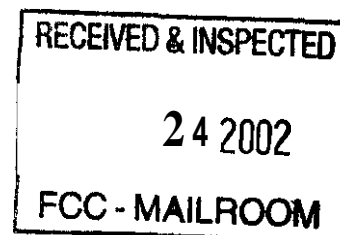
A handwritten signature in black ink, appearing to read "Charles Crawford", written over a horizontal line.

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, TX 75205  
(214) 443-9622      Tele

No. of Copies rec'd 044  
List ABCDE

CCEncinoD

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554



In the Matter of )

Amendment of 73.202 (b)  
Table of Allotments )  
FM Broadcast Stations )  
(Encino, TX) )

MB Docket No. 02-341  
RM-10594

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

PETITIONERs COMMENTS

1. Petitioner respectfully submits that the public interest would be served by allocating Channel 283A to Encino, Texas as that community's first local FM service. Encino is a Census Designated Place (CDP) with a population of 110 people according to the Texas State Data Center, estimate as of **January** 1, 1996. As of March 1999, 21 business establishments in Encino had been given a credit rating by Dun & Bradstreet. Encino has its own elementary school, its own volunteer fire department, its own post office and several churches. The proposed channel 283A will provide additional diversity and an outlet for local self-expression to Encino residents and therefore is in the public interest.

2. As the Commission is aware, this is one of a number of petitions filed by this Petitioner and other like-minded petitioners. The purpose of filing such petitions is to seek allotments to relatively small communities which are sufficiently removed from major metropolitan areas that there is no prospect that the allotment is merely a step to

inaugurate still another facility serving a major broadcast market. These petitions seek allotments to relatively small communities in their own right. For reasons stated above, the instant petition merits the requested allotment under established principles in Section 307(b) of the Communications Act.

3. The filing of a number of similar petitions has its genesis in the recent development in radio broadcasting of Localized Network Programming. This is a concept that has been developed by the major broadcasters for essentially mid to major markets. It is an approach that provides the economy of a network but the feel and appearance of local programming. The belief of the Petitioner and like-minded petitioners is that such a plan will work with small market communities on a regional basis. Given a geographical area, such as Eastern Oklahoma, Western Oklahoma, North East Texas, West Texas, South Texas, etc., the licensees of FM stations in small communities of a given region – whether the petitioners themselves or other licensees who might successfully outbid them for the license – could initiate unique network programming designed specifically for that region and additionally provide localized community inserts, such as local weather, local events, programming from specific remote locations, regional-specific news, public affairs, public service announcements, promotions and other programming giving life to the commission's policy favoring localism in broadcasting. While there would be local sales, the focus would also be in regional network sales, drawing on the advantages of advertising to the region and the unique nature of the region.

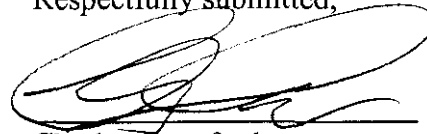
4. The vision is that providing radio service to an area of, say, 5,000 people may not allow for the operation of a traditionally run radio station. However, a network

of ten stations in an identifiable geographic area covering, say, 50,000 people could very well be economically viable. This concept is an approach to providing radio service to clusters of stations in small communities in the nature of modem radio developed by the major group owners for mid and large markets. Such a concept – in lieu of allotting the frequencies to communities in or adjacent to major radio markets – provides a further public interest reason in support of the Petition under Section 307(b).

5. Should this petition be granted, and Channel 283A be allotted to Encin0, Texas, Petitioner will apply for Channel 283A, and after it is authorized, will promptly construct the new facility.

The factual information provided in these Comments is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Charles Crawford', written over a horizontal line.

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, TX 75205  
(214) 443-9622      Tele

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

December 20, 2002

CCEncino